

**Remarks**

Claims 1-7 and 9 (new) are currently pending.

In the outstanding Action, claim 1 was rejected under 35 USC § 102(b) as being anticipated by, or alternatively, under 35 USC § 103(a) as being unpatentable over, US Patent No. 5,863,368 to Perrin.

Claims 2-6 were objected to as depending from a rejected base claim. Claim 7 was indicated to be allowed.

New claim 9 is entered to recite the subject matter of claims 1 and 2, which the Examiner indicated would be allowable in independent form. Allowance of claim 9 is respectfully requested.

Claim 1 has been amended to recite the movement of the cables as driving the transverse movement of the displacing means. Support for this amendment is found in paragraphs 44-46 of the specification.

Reconsideration of the rejection of claim 1 is respectfully requested in view of the following remarks.

The invention, as defined by claim 1, includes, among other features, displacement means for receiving the cable from the capstan and displacing the cable transversely relative to the rotating receiving surface, transverse movement of the displacement means being driven by the cable and being responsive to a magnitude of a difference between V1 and V2. In addition, claim 1 defines control means for controlling a transverse amplitude of the displacement directly by adjusting the speed V1 relative to the speed V2, wherein said amplitude is continuously variable during the positioning of the cable.

Thus, the displacement means is driven by the moving cable and is responsive to the ratio of the linear speed of the cable and the linear speed of the rotating receiving surface. As described in the specification in paragraphs 44-46, the cables moving through the levers exert a thrust on the levers, causing them to move transversely, which effects the placement of the cables in the undulating pattern. The control means for adjusting the speed V1 relative to the speed V2 while the cable is moving allows for the continuous adjustment of cable placement.

The cited Perrin patent, on the other hand, includes a displacement guide 7 that is actuated by a reciprocating rod 8 driven by a flywheel 82 and motor 80. To adjust the amplitude of the transverse displacement of the cable, the Perrin apparatus requires a change to the position of the reciprocating rod on the flywheel, as stated at Column 4, lines 62-65.

Thus, even if the Perrin apparatus includes a control means for controlling the ratio of the cable speed to the receiving surface speed, the speed ratio has no effect on the amplitude of the transverse displacement of the cable on the receiving surface.

Applicant submits, therefore, that claim 1 is allowable over the cited art.

Reconsideration of and withdrawal of the rejection of claim 1 is respectfully requested in view of the foregoing amendments and remarks.

The Examiner is invited to telephone the undersigned if there are any questions or to resolve any outstanding issues.

Respectfully submitted,



Martin Farrell  
Registration No. 35,506

Michelin North America, Inc.  
Intellectual Property Department  
P.O. Box 2026  
Greenville, South Carolina 29602  
Telephone 864-422-4648  
Fax 864-422-3517

Date: *31 March 2004*